

letter dated May 10, 2006 and demanded payment of \$1,630 in costs and attorney's fees incurred by iRacing in connection with its successful preparation, filing and argument of the motion to compel. Robinson's counsel did not respond.

4. As provided under Fed. R. Civ. P. 37(a)(4)(A), this Court has found that Robinson failed to adequately respond to December 13, 2005 discovery requests and accordingly Robinson should be required to pay iRacing \$1,630 in reasonable costs, including attorney's fees, incurred by iRacing due to Robinson's false and misleading initial disclosures. Fed. R. Civ. P. 37(c)(1).

DATED: May 31, 2006

Respectfully submitted,

iRacing.com Motorsport Simulations, LLC

By its attorneys,

/S/ Michael G. Andrews

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Certificate of Service

I, Michael G. Andrews, attorney for Plaintiff iRacing.com Motorsport Simulations, LLC, hereby certify that on this 31st Day of May, I filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to: Joseph F. Ryan, Lyne Woodworth & Evarts LLP, 600 Atlantic Avenue, Boston, MA 02210, counsel for Defendant Tim Robinson.

/S/ Michael G. Andrews

Michael G. Andrews

Certification Under LR 7.1(a)(2)

I, Michael G. Andrews, attorney for Plaintiff iRacing.com Motorsport Simulations, LLC, hereby certify that I complied with Local Rule 7.1 as set forth above in that I sent a letter to defendant's counsel on May 10, 2006 requesting payment of reasonable costs and attorney's fees associated with the motion to compel, which letter did not result in the defendant responding in any manner or in any other way resolving the dispute over reasonable costs and attorney's fees.

/s/ Michael Andrews

Michael G. Andrews